



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

July 22, 2022

**VIA ECF**

The Honorable Vernon S. Broderick  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Andrew Franzone*, 21 Cr. 446 (VSB)**


Dear Judge Broderick:

On June 10, 2022, the Court set a deadline for defense pre-trial motions of June 24, 2022, with the Government's response due by July 8, 2022, and defense reply, if any, due by July 15. (Dkt. 31.) Due to a scheduling conflict, the Government requested a brief adjournment of its response deadline, to July 22, 2022, which the Court granted. The Government writes to respectfully request a further adjournment to July 29, 2022, and a corresponding adjournment of the defense reply deadline, to August 5, 2022. The Government has conferred with defense counsel, who consent to this request.

The Government further requests that the Court adjourn the status conference currently scheduled for August 3, 2022 to an afternoon the week of August 15, 2022. The Government further requests that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), through the new conference date, in the interests of justice and to allow for the completion of briefing of pre-trial motions; defense counsel consents to this request.

Respectfully submitted,

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